REMARKS

This is a full and timely response to the outstanding final Office Action electronically delivered on August 22, 2011. Reconsideration and allowance of the application and presently pending claims 1-4, 13 and 15 are respectfully requested.

Present Status of the Application

Applicants thank the Examiner for the thorough examination of this application.

In the instant Office action, claims 1-4, 13 and 15 are rejected under 35 U.S.C 103(a) as being unpatentable over Oswald (U.S. Pat. No.4,445,435; hereinafter "Oswald") or Swallow (U.S. Pat. No.3,750,586; hereinafter "Swallow") or Kirsch (U.S. Pat. No.3,596,137; hereinafter "Kirsch"), each in view of Lin (U.S. Pat. No.5,982,601; hereinafter "Lin").

In response thereto, Applicants respectfully file an RCE together with this Preliminary Amendment in which claim 1 has been amended to traverse all the rejections on the grounds set forth in detail below. Beside, Applicants have amended claims 3, 13 and have canceled claim 4 in view of amendment to claim 1. No new matter has been entered since the amendment is fully supported by Figs. 4, 5A, 5B and the related illustration thereof as originally filed. Applicants thereby respectfully assert that all the pending claims 1-3, 13 and 15 are placed in proper condition for allowance. Reconsideration of all the pending claims is respectfully requested.

Interview Summary

Applicants respectively recall during the telephone interview conducted between our Attorney of record Mr. Jiawei Huang and the Examiner NADAV, ORI. Examiner NADAV, ORI suggested that amending claim 1 to recite in part "a silicon controlled rectifier (SCR), which comprises a first connection terminal, a second connection terminal, and a third connection terminal, wherein the first connection terminal and the second connection terminal are respectively and directly connected to an I/O pad and a ground voltage, wherein the anti-latch-up circuit consisting of a capacitor and a resistor, a first end of the resistor is directly connected to the fourth connection terminal, a second end of the resistor is directly connected to the sixth connection terminal, a first contact end of the capacitor is directly connected to the sixth

connection terminal and a second contact end of the capacitor is directly connected to the fifth connection terminal" will overcome the rejection, as recited in previous office action.

Discussion of the claim rejection under 35 USC 103

Claims 1-4, 13 and 15 are rejected under 35 U.S.C 103(a) as being unpatentable over Oswald or Swallow or Kirsch, each in view of Lin.

In response thereto, Applicants have amended claim 1 to patently define the present application over the cited references. Now, Applicants hereby otherwise traverse these rejections.

As shown in Figs. 4 and 5A of the present application, the anti-latch-up circuit 164 includes a capacitor 166 and a resistor 168. Besides, a first end of the resistor 168 is directly connected to the fourth connection terminal 126, a second end of the resistor 168 is directly connected to the sixth connection terminal 130, a first contact end of the capacitor 166 is directly connected to the sixth connection terminal 130, and a second contact end of the capacitor 166 is directly connected to the fifth connection terminal 128. Accordingly, the capacitor 166 and the resistor 168 are directly connected in series between the voltage source Vcc and the ground voltage.

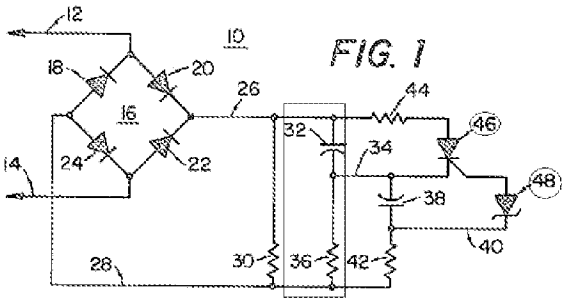

FIG. 1

By contrast, as shown in Fig. 1 of Oswald, the resistor 36 is connected to the leg wires 12 and 14 through the rectifier 16. In other words, the resistor 36 is indirectly connected to the leg wires 12 and 14. Besides, although an end of the capacitor 32 is directly connected to the resistor 36, the other end of the capacitor 32 is not directly connected to the ground. In other words, the connection structure of the resistor 36 and the capacitor 32 of Oswald is substantially different from the connection structure of the resistor 168 and the capacitor 166 of the present application. Accordingly, Oswald fails to disclose the technical feature reciting "the anti-latch-up circuit

consists of a capacitor and a resistor, a first end of the resistor is directly connected to the fourth connection terminal, a second end of the resistor is directly connected to the sixth connection terminal, a first contact end of the capacitor is directly connected to the sixth connection terminal and a second contact end of the capacitor is directly connected to the fifth connection terminal" as set forth in amended claim 1.

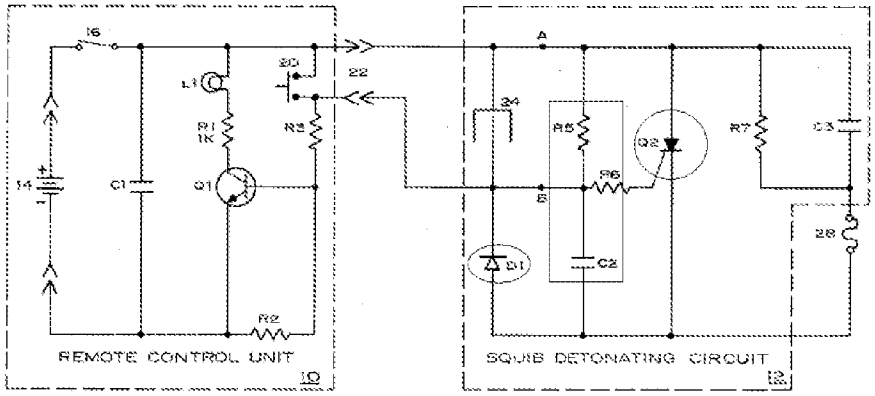

FIG. 2.

Furthermore, as shown in Fig. 2 of Swallow, the resistor R5 is connected to the power supply 14 through the switch 16. In other words, the resistor R5 is indirectly connected to the power supply 14. Besides, although an end of the capacitor C2 is directly connected to the resistor R5, the other end of the capacitor C2 is not directly connected to the ground. In other words, the connection structure of the resistor R5 and the capacitor C2 of Swallow is substantially different from the connection structure of the resistor 168 and the capacitor 166 of the present application. Accordingly, Swallow fails to disclose the technical feature reciting "the anti-latch-up circuit consists of a capacitor and a resistor, a first end of the resistor is directly connected to the fourth connection terminal, a second end of the resistor is directly connected to the sixth connection terminal, a first contact end of the capacitor is directly connected to the sixth connection terminal and a second contact end of the capacitor is directly connected to the fifth connection terminal" as set forth in amended claim 1.

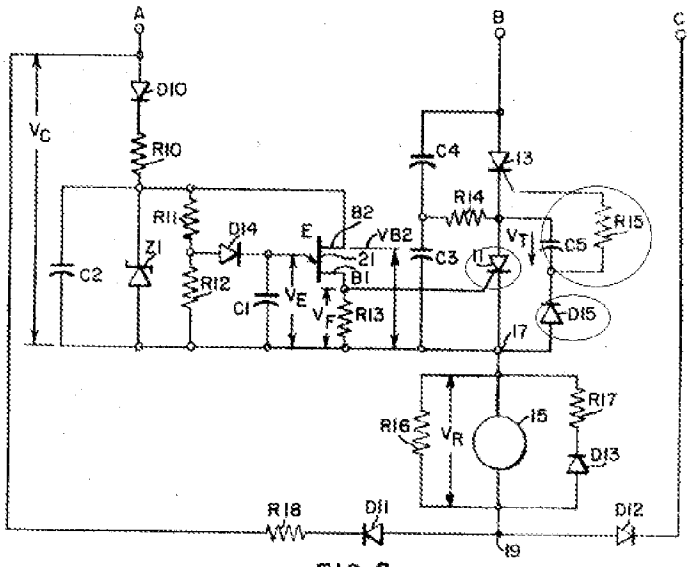

FIG. 6

Furthermore, as shown in Fig. 6 of Kirsch, the resistor R15 is connected to the terminal B through the SCR 13. In other words, the resistor R15 is indirectly connected to the terminal B. Besides, although an end of the capacitor C5 is directly connected to the resistor R15, the other end of the capacitor C5 is not directly connected to the ground. In other words, the connection structure of the resistor R15 and the capacitor C5 of Kirsch is substantially different from the connection structure of the resistor 168 and the capacitor 166 of the present application. Accordingly, Kirsch fails to disclose the technical feature reciting "the anti-latch-up circuit consists of a capacitor and a resistor, a first end of the resistor is directly connected to the fourth connection terminal, a second end of the resistor is directly connected to the sixth connection terminal, a first contact end of the capacitor is directly connected to the sixth connection terminal and a second contact end of the capacitor is directly connected to the fifth connection terminal" as set forth in amended claim 1.

"[O]bviousness requires a suggestion of all limitations in a claim." *CFMT, Inc. v. Yieldup Int'l. Corp.*, 349 F.3d 1333, 1342 (Fed. Cir. 2003) (citing *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)).

From the above, Oswald, Swallow and Kirsch fails to explicitly teach or implicitly suggest at least the technical feature of "the anti-latch-up circuit consists of a capacitor and a resistor, a first end of the resistor is directly connected to the fourth connection terminal, a

second end of the resistor is directly connected to the sixth connection terminal, a first contact end of the capacitor is directly connected to the sixth connection terminal and a second contact end of the capacitor is directly connected to the fifth connection terminal" as set forth in the currently amended claim 1, and Lin also fails to explicitly teach or implicitly suggest said technical feature. Therefore, persons of ordinary skill in the art would not be able to achieve the invention set forth by claim 1 by following the teachings of Oswald, Swallow, Kirsch and Lin, whether taking the teachings alone or in combination. Claim 1 is therefore submitted to be non-obvious over the prior art of record, and withdrawal of the 103 rejection on claim 1 is courteously requested.

If an independent claim is non-obvious under 35 U.S.C. Section 103, then any claim depending therefrom is non-obvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). As such, claims 2-3, 13 and 15 directly or indirectly depending upon the allowable claim 1 should be allowed as a matter of law.

Withdrawal of the 103 rejections is accordingly requested.

CONCLUSION

For at least the foregoing reasons, it is believed that all the pending claims 1-3, 13 and 15 of the present application patently define over the prior art and are in proper condition for allowance. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is invited to call the undersigned.

Respectfully submitted,
J.C. PATENTS

Date: December 21, 2011

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